

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LAURIE SNELL PARNELL,)	CIVIL ACTION
)	
Plaintiff,)	Case No.: 2:20-cv-01837-WSH
)	
v.)	The Hon. W. Scott Hardy
)	
AMERICAN WARRIOR INITIATIVE, and)	<i>Electronically Filed and Served via</i>
FAIRWAY INDEPENDENT MORTGAGE)	<i>CM/ECF</i>
CORPORATION,)	
)	
Defendants.)	
)	

CONSENT MOTION TO STAY CASE PENDING ARBITRATION

Defendants, American Warrior Initiative and Fairway Independent Mortgage Corporation (“**Defendants**”), by and through their counsel, and Plaintiff, Laurie Snell Parnell (“**Plaintiff**”), file the within Motion to Stay Case Pending Arbitration and in support thereof state as follows:

1. On February 1, 2021, Defendants filed a “Motion to Compel Arbitration and Stay Responsive Pleading Deadline” (the “**Motion**”) based upon an arbitration provision in Plaintiff’s Employee Handbook. *See* ECF Docs. 10-12.

2. On February 22, 2021, Plaintiff filed her response to the Motion and did not oppose the same. *See* ECF Doc. 13.

3. Based upon the above, Defendants move this Honorable Court to enter an appropriate Order staying the within action pending Plaintiff’s submission of the dispute to arbitration in accordance with the provisions of the agreement between the parties hereto as set forth in Defendants’ Motion.

4. The undersigned contacted Plaintiff’s counsel and Plaintiff consents to the relief requested herein.

WHEREFORE, the parties respectfully request that the Court enter the proposed order to stay all proceedings in this matter pending the submission of the dispute to arbitration.

Respectfully Submitted,

**DILLON, MCCANDLESS, KING,
COULTER & GRAHAM, L.L.P.**

Dated: March 26, 2021

By: /s/ Jordan P. Shuber
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